

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Bienvenido I. Lugo-Marchant
Plaintiff,
v.

Civil Action No. 05 11317 NMG

Peter Tsickritzis, Kevin Kingston,
and United Liquors Limited et al.,
Defendants

**PLAINTIFF'S MOTION TO COMPEL DEFENDANTS TO PRODUCE COMPLETE AND SUBSTANTIVE
RESPONSES TO THE INTERROGATORIES PROPOUNDED BY THE PLAINTIFF**

The Plaintiff supports the US Constitution and is a US citizen. This action arises from the Mr. Lugo having worked for the Defendants and being denied a promotion, demoted, harassed, denied training, denied overtime wages, paid less than stipulated, denied medical coverage, slandered-labeled, denied ADA protections, denied light-work accommodation, retaliation for asking his supervisors the reasons for discrimination, and for having initiated a complaint with the Massachusetts Commission Against Discrimination ("MCAD") and the Equal Employment Opportunities Commission ("EEOC"). Mr. Lugo believes these actions are a mere unlawful pretext not accepted by any US laws or regulations.

U.S. AMMENDMENT 14TH AND THE DEFENDANTS' VAGUE ANSWERS TO INTERROGATORIES

The Defendant's richness is a discoverable issue in this claim as Mr. Lugo also seeks punitive damages and other damages not specified at the time of writing this Motion. On Restatement (2nd) Torts, s. 908 e it says: "*the wealth of the Defendant is ...relevant since the purposes of the exemplary damages are to punish for a past event and to prevent future offenses, and the degree of punishment or deterrence resulting from a judgement to some extent is proportional to the means of the guilty persons*". 42 U.S.C.A. Sec. 1981a, Sec. 2000e et seq.; 13 A.L.R. 2D 277, 14 A.L.R. Fed. 608. City of Newport v. Fact Concerts, Inc. 453 U.S. 247, 270, 101 S. Ct. 2748, 2761 (1981). Seifert v. Solem, 387 F. 2d 925 (7th Cir. 1967)

Mr. Lugo is not required to make a prima facie showing that he is entitled to punitive damages and others as his claim is already accepted and he is cooperating with the USDC by following the Rules to the best of his abilities without seeing the same from the Defendants. CEH, Inc. v. FV "Seafarer" 148 F.R.D. 469 (D.R.I. 1993), aff'd 153 F.R.D. 491 (1994), 27 A.L.R. 3d 1375, 1377 (1969) and other cases. As an example, after attorney Ackerstein bluntly persuaded Mr. Lugo of her apparent sincerity and naiveté, Mr. Lugo shared more details that can be used at trial or to evaluate possible settlement options while denying the

Plaintiff the "equal protections of the law", thus causing delay and confusion. Mr. Lugo was led to believe that Puerto Rico is not part of the United States of America and had to explain that to a seasoned lawyer who should know better. Mr. Lugo believes the Honorable US Judge Torruellas, who sits at the 1st US Circuit, is as Puerto Rican as his ancestors are.

Mr. Lugo has seen public records with the name of the Defendant-Peter Tsickritzis (Peter N.Tsickritzis; exhibit 1-2) in relation to land property in Barnstable and Norfolk County Registry of Deeds while Defendant-Tsickritzis claims that that is personal. Defendant-Kingston did not provide good answers either. Furthermore, while at the Deposition, Defendant-Tsickritzis overreacted when hearing about "Martignetti (a distribution company; exhibit 3) having bought United". Hence, the Plaintiff's request is not spurious. 54 ALR 4th 998 (1987).

WHEREFORE, the Plaintiff respectfully prays this Honorable US Court agrees with this Plaintiff's Motion to Compel the Defendants to Produce Complete and Substantive Responses to Interrogatories Propounded by the Plaintiff. The Plaintiff would like this Honorable US Court ordering the Defendants to:

1. provide complete and substantive answers from the Defendants regarding their financial records and richness
2. order Mr. Tsickritzis to submit a copy of his medical records, including but not limited to his mental health
3. order the Defendants to answer in detail what other lawsuits, administrative complaints or complaints they currently face
4. order the Defendants to answer in detail what other lawsuits, administrative complaints or complaints they faced.
5. order the Defendants to answer if they exist.

Respectfully submitted,

Bienvenido I Lugo-Marchant
Pro se, in forma pauperis











































CERTIFICATE OF SERVICE

I hereby certify that on Jan 8, 2007, this document was served upon the defendant's counsel, JACKSON LEWIS, by first class mail, postage paid.

Norfolk County Registry of Deeds William P O'Donnell
Land Records List by Name

Search name: TSICKRITZIS
Gtors/Gtees: All Parties
Town: *All
Document types: *ALL
Database searched: Land Document Index from Jan 1,1967 thru Dec 26,2006

Full Name Reverse Party	Document Desc Document Type	Town Date Recvd Book-Page	
TSICKRITZIS, ELLEN &AL (Gtor) METROPOLITAN CREDIT UN	SALE CORONATION DR. Notice	Dedham 07-03-1978 5482-746	   
TSICKRITZIS, ELLEN &AL (Gtor) METROPOLITAN CREDIT UN	SALE-UCC Notice	????????? 05-23-1984 6404-519	   
TSICKRITZIS, ELLEN D (&AL) (Gtee) HORAN, WILLIAM T (&AL)	LOT 132 PLBK 3229 PL 1712 Deed	Dedham 08-06-1973 4967-104	   
TSICKRITZIS, ELLEN D (&AL) (Gtor) PROVIDENT INSTITUTION	LOT 132 PLBK 3229 PL 1712 Mortgage	Dedham 08-06-1973 4967-105	   
TSICKRITZIS, ELLEN D. (&AL) (Gtor) METROPOLITAN CREDIT UN	CORONATION DR. Mortgage	Dedham 05-12-1989 8315-270	   
TSICKRITZIS, ELLEN D. &AL (Gtor) METROPOLITAN CREDIT UN	SEE RECORD Mortgage	Dedham 04-22-1992 9307-590	   
TSICKRITZIS, ELLEN D. &AL (Gtee) HORAN, WILLIAM T. &AL	CORONATION DR.LOT 132 PL.3229-592 SEE RECORD Deed	Needham 07-06-1993 9971-607	   
TSICKRITZIS, ELLEN D. &AL (Gtor) OMEGA FINANCIAL INC.	CHARLES COURT EAST CONDO. UNIT 312 BLDG.3 SEE RECORD Mortgage	Dedham 04-15-1997 11771-238	   
TSICKRITZIS, ELLEN D. &AL (Gtor) GLEESON, PATRICK V &AL	CORONATION DR.LOT 132 PL.WHITMAN & HOWARD D.12/1953 SEE RECORD Deed	Dedham 08-31-1998 12778-62	   
TSICKRITZIS, ELLEN D (Gtor)	CORONATION DR.LOT 132 PL.3229-592 SEE RECORD Affidavit	Needham 11-29-2006 24308-245	   
More names may be available			
< Previous	Next >	Show Print Cart	Tax Liens
Curr Year	Print Listing	Land Court	Rec Land Plans

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To see the next page of available names, click on Next>.
To see the previous panel displayed, click on <Previous.
To view an abstract, click on the document icon with "ABS".
To view an image, click on the document icon with "DOC".
To refine your search to a name that is displayed, click on the name hyperlink.

Barnstable County Registry of Deeds John F. Meade	
Land Records List by Name	
Search name:	TSICKRITZIS
Gtors/Gtees:	All Parties
Town:	*All
Document types:	*ALL
Database searched:	Land Document Index from Jan 1,1704 thru Dec 22, 2006 #80067 @ 01:39
Previous Next Show Print Card Tax Liens Curr Year Print Listing Land Count Rec Land Plans	

Full Name Reverse Party	Document Desc Document Type	Town Date Recvd	Book-Page	
TSICKRITZIS, ELLEN (&H) (Gtee) HYNES, DANIEL E (&O)	UNIT H-4 Deed	Bourne 06-28-2002	15314-318	
TSICKRITZIS, ELLEN (&H) (Gtor) MORTGAGE ELECTRONIC RE	UNIT H-4 Mortgage	Bourne 12-10-2004	19332-86	
TSICKRITZIS, ELLEN (&O) (Gtor) MORTGAGE ELECTRONIC RE	UNIT H-4 Mortgage	Bourne 06-15-2006	21102-169	
TSICKRITZIS, PETER N (&O) (Gtor) OMEGA FINANCIAL INC	UNIT H-4 Mortgage	Bourne 06-28-2002	15314-319	
TSICKRITZIS, PETER N (&W) (Gtor) MORTGAGE ELECTRONIC RE	UNIT H-4 Mortgage	Bourne 12-10-2004	19332-86	

More names may be available

64 Granston Dr
Redhan 02026
4 Dogwood Rd
Bourne 02532
36 Shore Dr 02360

16 MK
10 Robinson Rd
Wareham

Exhibit 2

WINE BUSINESS ONLINE

Wine Business Insider - August 2006**Distributor Watch: Martignetti Family, United Consolidate in Massachusetts**

The **Martignetti** family, whose wine and spirits empire includes distributorships and retail stores, has agreed to buy **United Liquors Ltd.**, a division of the **United Group**. The United Group is owned by **Ray Tye**, the philanthropist now in his mid-80s. Executives at the two companies could not immediately be reached for comment.

A preliminary agreement has been reached in which **Martignetti Companies** will purchase all of United Liquors operations in Massachusetts, including the shares owned by **Southern Wine & Spirits of America Inc.** The United Group of Massachusetts is one of the nation's pre-eminent multi-state wine, spirits and beer distributors, serving six open and control states, including Massachusetts, Maine, New Hampshire, Vermont, Virginia and North Carolina. Martignetti Companies operate in Massachusetts, but also in Rhode Island, New Hampshire, Vermont and Maine.

In February 2005, United agreed to sell a 25 percent ownership stake to Southern Wine & Spirits of America. At that time, Tye commented that the partnership with Southern would strengthen both companies while assuring job security for United employees and the long-term continuity of the operation. However, as part of the deal announced this week, the Martignettis will apparently buy out Southern's stake.

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EXHIBIT #3